

EXHIBIT 3

From: Everson, Katelin <keversion@sidley.com>
Sent: Monday, May 12, 2025 10:32 AM
To: Houghton-Larsen, M Annie; Crowell, Nicholas P.; Ransom, Rollin; Horner, James R.
Cc: Gottlieb, Michael; Sullivan, Brady M.
Subject: RE: Graham v. UMG - Correspondence re May 2, 2025 meet and confer & ESI protocol
Attachments: 2025.05.12 Draft ESI Stipulation (Sidley Edits) 4911-9477-5603 17.docx; Redline - 2025.05.07 Draft ESI Stipulation (Sidley Edits)_WFG Edits and 2025.05.12 Draft ESI Stipulation (Sidley Edits)-4911-9477-5603-v17.pdf

*** EXTERNAL EMAIL ***

Annie,

In response to your May 7 letter, attached is an updated draft of the ESI protocol, and a redline against the version you sent. We continue to oppose your proposal to allow redactions (other than on privilege and PII grounds) of responsive 24 hour RSMF segments. We think your proposal is highly unusual and inappropriate for the reasons we noted at our last meet and confer, including, amongst other things, that there is no provision in the federal or local rules for redaction of non-responsive portions of otherwise responsive documents, that often the broader context of a RSMF communication is necessary for understanding the portions deemed directly responsive, and the parties have agreed to a protective order which—as counsel to Plaintiff argued at the April 2, 2025 initial pretrial conference before Judge Vargas—should be appropriate and sufficient to ensure that sensitive information is protected. *See* Tr. at 12:1-8. Your proposal is also at odds with the case law on this issue. *See, e.g., Al Thani v. Hanke*, 2022 WL 1684271 (S.D.N.Y. May 26, 2022). We note that per section 5(d) of the Case Management Order, our deadline to file the ESI protocol with the Court this Wednesday, May 14. We are available to meet and confer tomorrow between 1-2 pm, 2:30-3:30 pm or after 4:30 pm ET on the ESI protocol and the other items in your May 7 letter.

Best,
Katelin

KATELIN EVERSON
Managing Associate

SIDLEY AUSTIN LLP
+1 212 839 8427
keversion@sidley.com

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immediately.

From: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>
Sent: Wednesday, May 7, 2025 7:06 PM
To: Crowell, Nicholas P. <ncrowell@sidley.com>; Ransom, Rollin <rransom@sidley.com>; Everson, Katelin <keversion@sidley.com>; Horner, James R. <jhorner@sidley.com>

Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Sullivan, Brady M. <BSullivan@willkie.com>

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All,

Please see the attached correspondence and ESI protocol mark up in track changes and a redline.

Thanks,

M. Annie Houghton-Larsen

Willkie Farr & Gallagher LLP

787 Seventh Avenue | New York, NY 10019-6099

Direct: [+1 212 728 8164](tel:+12127288164) | Fax: +1 212 728 9164

mhoughton-larsen@willkie.com | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

Pronouns: she, her, hers

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